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**COUNSEL FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:	§	Chapter 11
	§	
SPHERATURE INVESTMENTS LLC,	§	Case No.: 20-42492
<i>et al.</i>	§	
	§	
Debtors.¹	§	Jointly Administered

AGENDA FOR MATERS SCHEDULED FOR HEARING ON APRIL 6, 2021

1. Pleading: *Motion for Order Extending the Exclusive Periods During Which Only Debtors May File and Confirm a Plan* (the “**Exclusivity Motion**”) [Docket No. 158]

Moving Party: Debtors

Responses/Objections Received:

a. N/A

Related Document(s):

- a. *Notice of Hearing filed by Spherature Investments LLC* [Docket No. 159]
- b. *Certificate of No Objection to the Exclusivity Motion* [Docket No. 208]

Status: Uncontested. The Debtors will request that the Court enter the proposed order as filed and submitted.

¹ The “**Debtors**” in the above-captioned jointly administered chapter 11 bankruptcy cases (“**Cases**”) are: Spherature Investments LLC EIN#5471; Rovia, LLC EIN#7705; WorldVentures Marketing Holdings, LLC EIN#3846; WorldVentures Marketplace, LLC EIN#6264; WorldVentures Marketing, LLC EIN#3255; WorldVentures Services, LLC EIN#2220.

2. **Pleading:** *Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling an Auction and Sale Hearing; (III) Approving the Sale of Substantially All of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests; (IV) Authorizing the Assumption and Assignment Of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief (the “**Bid Procedures Motion**”) [Docket No. 92]*

Moving Party: Debtors

Responses/Objections Received:

- a. *Limited Objection of Seacret Direct, LLC to Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling an Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; (IV) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief [Docket No. 142]*
- b. *Objection of Melody Yiru and Those Similarly Situated to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling an Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; (IV) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief [Docket No. 166]*
- c. *Joinder of Janie Braun, Braun Marketing Company, Matt Morris, Rhonda Morris, Dr. Troy Brown, Kathy Brown, Kari Schneider, Lisha Schneider, Byron Schrag, and Martin Ruof to Seacret Direct, LLC’s Limited Objection to Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling an Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; (IV) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief [Docket No. 169]*
- d. *Montgomery Capital Advisers, LLC’s Objection to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling an Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; (IV) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief [Docket No. 217]*

Related Documents:

- a. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 147]
- b. *Agreed Motion to Continue March 16, 2021 Hearing* [Docket No. 171]
- c. *Exhibit and/or Witness List filed by Seacret Direct, LLC* [Docket No. 172]
- d. *Order Granting Motion to Continue March 16, 2021 Hearing* [Docket No. 174]
- e. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 175]
- f. *Exhibit and/or Witness List filed by Montgomery Capital Advisers, LLC* [Docket No. 191]
- g. *Exhibit and/or Witness List filed by Seacret Direct, LLC* [Docket No. 192]
- h. *Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 193]
- i. *Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 195]
- j. *Agreed Motion to Continue March 25, 2021 Hearing* [Docket No. 197]
- k. *Order Granting Motion to Continue March 25, 2021 Hearing* [Docket No. 202]
- l. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 203]
- m. *Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 210]
- n. *Exhibit and/or Witness List filed by Montgomery Capital Advisers, LLC* [Docket No. 211]
- o. *Exhibit and/or Witness List filed by Seacret Direct, LLC* [Docket No. 212]
- p. *Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 213]
- q. *Amended Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 215]
- r. *Amended Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 219]

Status: Today will be a status conference on this matter. The Debtors will ask the Court to continue this matter to April 16, 2021, or such other later date that is convenient for the Court, because the Debtors continue to negotiate the terms of an asset purchase agreement with the stalking-horse bidder.

3. **Pleading:** *Emergency Motion for Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* (the “**Cash Collateral Motion**”) [Docket No. 18]

Moving Party: Debtors

Responses/Objections Received:

- a. *Montgomery Capital Advisers, LLC's Objection to Debtors' Emergency Motion for Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* [Docket No. 216]
- b. *Montgomery Capital Advisers, LLC's Amended Objection to Debtors' Emergency Motion for Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* [Docket No. 218]

Related Document(s):

- a. *First Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 55]
- b. *Second Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 97]
- c. *Third Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 136]
- d. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 147]
- e. *Agreed Motion to Continue March 16, 2021 Hearing* [Docket No. 171]
- f. *Order Granting Motion to Continue March 16, 2021 Hearing* [Docket No. 174]
- g. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 175]
- h. *Exhibit and/or Witness List filed by Montgomery Capital Advisers, LLC* [Docket No. 191]
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- j. *Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 195]
- k. *Agreed Motion to Continue March 25, 2021 Hearing* [Docket No. 197]
- l. *Order Granting Motion to Continue March 25, 2021 Hearing* [Docket No. 202]
- m. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 203]
- n. *Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 210]
- o. *Exhibit and/or Witness List filed by Montgomery Capital Advisers, LLC* [Docket No. 211]
- p. *Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 213]
- q. *Amended Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 215]
- r. *Amended Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 219]

Status: The Debtors, the Official Committee of Unsecured Creditors, and Montgomery Capital Advisors (“MCA”) have agreed to the entry of another (fourth) interim order. The order will be substantially the same as the third interim order save and except that it will allow—subject to a full reservation of rights, claw back, disgorgement, and objection—payment of MCA’s reasonable attorney fees as further adequate protection. The parties will ask the Court to set the next cash-collateral hearing for April 16, 2021, or such other later date that is convenient for the Court.

DATED: April 6, 2021

Respectfully submitted:

/s/ Marcus A. Helt

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CERTIFICATE OF SERVICE

I hereby certify that, on April 6, 2021, a true and correct copy of the foregoing document was served electronically on all parties in interest to these Cases by the Court’s PACER system.

/s/ Stephen A. Jones

Stephen A. Jones